

Case Name: Falls Lake v. Kalnitech Construction Corp., et al. Case Number: 22-cv-01473 (KAM)(PK)

PROPOSED DISCOVERY PLAN/SCHEDULING ORDER

E

DONE**NOT
APPLICABLE****DATE****A. ACTIONS REQUIRED BEFORE THE INITIAL CONFERENCE**

1. Rule 26(f) Conference held

January 17, 2023

2. Rule 26(a)(1) disclosures exchanged

January 30, 2023

3. Requested:

a. Medical records authorization

X

b. Section 160.50 releases for arrest records

X

c. Identification of John Doe/Jane Doe defendants

X

4. Procedures for producing Electronically Stored Information (ESI) discussed

X

5. Confidentiality Order to be submitted for court approval (see Standing Confidentiality Order on the Chambers website)

X

B. SETTLEMENT PLAN

1. Plaintiff to make settlement demand

February 15, 2023

2. Defendant to make settlement offer

March 15, 2023

3. Referral to EDNY mediation program pursuant to Local Rule 83.8? (If yes, enter date for mediation to be completed)

April 17, 2023

4. Settlement Conference (proposed date)

C. PROPOSED DEADLINES

1. Motion to join new parties or amend pleadings

X

2. Initial documents requests and interrogatories

January 17, 2023

3. All fact discovery to be completed (including disclosure of medical records)

March 15, 2023

4. Joint status report certifying close of fact discovery and indicating whether expert discovery is needed

April 17, 2023

5. Expert discovery (only if needed)		<i>Check here if not applicable</i>	
Plaintiff expert proposed field(s) of expertise:	N/A		
Defendant expert proposed field(s) of expertise:	N/A		
	DONE	NOT APPLICABLE	DATE
a. Affirmative expert reports due		X	
b. Rebuttal expert reports due		X	
c. Depositions of experts to be completed		X	
6. Completion of ALL DISCOVERY (if different from C.3)			March 15, 2023
7. Joint status report certifying close of ALL DISCOVERY and indicating whether dispositive motion is anticipated			April 17, 2023
8. If any party seeks a dispositive motion , date to (a) file request for pre-motion conference (if required), or (b) file briefing schedule for the motion			April 28, 2023
9. Proposed Joint Pre-Trial Order due (if no dispositive motion filed)			May 30, 2023
D. CONSENT TO MAGISTRATE JUDGE JURISDICTION			
1. All parties consent to Magistrate Judge jurisdiction for dispositive motion?			Yes No X
2. All parties consent to Magistrate Judge jurisdiction for trial?			Yes No X
E. COLLECTIVE ACTION AND CLASS ACTION MOTIONS ONLY			
1. Motion for collective action certification in FLSA cases			N/A
a. Response due			
b. Reply due			
2. Motion for Rule 23 class certification			
a. Response due			
b. Reply due			

This Scheduling Order may be altered or amended only upon a showing of good cause based on circumstances not foreseeable as of the date of this order.

SO ORDERED:

Peggy Kuo
PEGGY KUO
 United States Magistrate Judge

December 16, 2022

Date